

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

UNITED STATES OF AMERICA

v.

DANIEL J. GARCIA

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7:19-cr-522-S1-4

**DEFENDANT'S FIRST PROPOSED VOIR DIRE**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant DANIEL J. GARCIA, by and through his undersigned counsel, and respectfully submits the following first proposed jury voir dire questions:

1. Are any of you concerned about potentially being exposed to COVID-19 during this trial, and if so, could that affect your ability to serve as a juror in this case, and in particular to devote the time and attention that would be needed to take your time to deliberate and reach the correct verdicts?
2. The participants in this trial, including witnesses, lawyers, and defendants, may be required to wear masks or may choose to wear masks, and witnesses may testify from behind plexiglass while wearing a mask, and some witnesses may even testify remotely via video. Do any of you believe that any of these procedures may affect your ability to understand what is said and presented or to evaluate witnesses' facial expressions and demeanor, so that you can adequately evaluate their credibility?
3. At least one of the defendants in this case is a lawyer. Do any of you have a positive or negative view of lawyers generally, and if so, could that affect your ability to be impartial in this case?

4. The term “IOLTA” or “interest on lawyer’s trust account” may come up in this trial. Have any of you heard of that type of account, and if so, could that affect your view of how such an account may have been used in this case?
5. Some of the people involved in this case may have been or may currently be public officials in Weslaco and Rio Grande City, particularly for the City of Weslaco and the Rio Grande City School District, or elsewhere. Are you familiar with or involved in any of those organizations or politics in those areas and do you have a positive or negative view of them? If so, could that affect your ability to be impartial in this case? Do you have a positive or negative view of politicians and public officials generally, and if so, could that affect your ability to be impartial in this case?
6. The name “Leo Lopez” may come up in this trial as someone who may have been involved in this case and who may have made statements pertaining to this case. Did any of you know him or had any of you heard of him, and if so, could that affect your ability to be impartial in this case and in particular to decide what, if any, weight to place on any statements he may have made?

Respectfully submitted,

s/Christopher Sully  
CHRISTOPHER SULLY  
Attorney-in-Charge  
Counsel for Daniel Garcia  
Southern District of Texas 1119552  
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**CERTIFICATE OF SERVICE**

On August 27, 2021, this document was served on all counsel of record via ECF.

*s/Christopher Sully*  
CHRISTOPHER SULLY